

REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Specification and Claims

The claims and specification have been amended to correct various grammatical and idiomatic errors, and to place the application in proper U.S. format. Because the changes are all formal in nature, it is respectfully submitted that the changes do not involve new matter.

2. Rejection of Claims 1-4 Under 35 USC §102(e) in view of U.S. Patent No. 2002/0082048 (Toyoshima)

This rejection is respectfully traversed on the grounds that the Toyoshima patent fails to disclose or suggest a device having a “control chip,” as claimed, that serves to:

- control a flash memory controller, *and*
- link a host to a wireless network so that the host can communicate with the wireless network.

Instead of a control chip, as claimed, the device of Toyoshima uses a baseband signal processor 150 and microprocessor 170. The baseband signal processor 150 does not correspond to the claimed control chip because it does not control a flash memory controller, and the microprocessor 150 does not correspond to the claimed control chip because it neither controls a flash memory controller nor a wireless wide bandwidth local network module:

While the device of Toyoshima performs functions similar to those of the claimed invention in that it connects a host to a wireless network (via the baseband signal processor 150) and stores data supplied by the host (via the microprocessor), it does not include a dedicated flash memory controller, as claimed, that is in turn controlled by a control chip, the control chip also managing the establishment of wireless communications by the network module.

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The difference can be understood by a side-by-side comparison between the devices of Toyoshima and the claimed invention:

<u>Claim 1</u>	<u>Toyoshima</u>
A pen drive for connecting to a wireless wide bandwidth local network, comprising:	The device of Toyoshima is similar to a pen drive.
a USB <u>interface</u> ;	The device of Toyoshima includes a USB interface.
at least one flash memory, having an initialization program for a wireless wide bandwidth local network module;	Toyoshima discloses memories 160 that store data from the host (e.g., pictures taken by a camera).
a flash memory controller;	Microprocessor 170 controls memories 160.
a control chip, for controlling exchange of commands and instructions between said pen drive and a host, for managing said flash memory controller and said wireless wide bandwidth local network module, and also for controlling initialization of said wireless wide bandwidth local network module, said control chip being arranged to control said flash memory controller to enable said host to save/retrieve data or commands to/from said flash memory;	Microprocessor 170 controls exchange of commands and instructions between the pen drive and host—there is no “control chip” for controlling a flash memory controller.
a wireless wide bandwidth local network module, electrically connected to said host by said USB <u>interface</u> , for enabling to process a wireless network protocol to convert a digital protocol data signal into an analogue -analog protocol data signal; and	The claimed network module appears to correspond to signal processor 150
an antenna module, for receiving or transmitting said analogue -analog protocol data signal,	The antenna module appears to correspond to the transmitter, receiver, duplexer, and antenna of Toyoshima (or the transmitter, receiver, and duplexer could be considered to be part of the network module).
wherein when said drive connects to said host through said USB <u>interface</u> , said host saves/retrieves data or command - commands to/from said flash memory and also links -is linked to said wireless wide bandwidth local network through said wireless wide bandwidth local network module and said antenna module.	

As is apparent from the chart, the architecture of the device of Toyoshima is not the same as that of the claimed invention, because Toyoshima does not include an element corresponding to the claimed “control chip,” which *controls* the flash memory controller. Microprocessor 160 of

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Toyoshima cannot reasonably be said to correspond to both the memory controller and the control chip since it does not control itself.

The different architectures are not merely a matter of design choice. Whereas the claimed invention is a conventional full-featured flash memory that has added network communications capabilities, the device of Toyoshima is basically an overflow image storage device capable of uploading images to a server when the host's memory is full. The memories of Toyoshima serve as a buffer for images that will eventually be uploaded, and therefore a separate "flash memory controller" is not required in the device of Toyoshima. In fact, as illustrated in Fig. 4 of the Toyoshima publication, the device of Toyoshima does not send any data unless the memories are full. In Toyoshima, so long as there is enough space in the memories, the device remains in data receiving mode and does not forward any data over the network ("to Server"). In contrast, use of the wireless network module of the claimed invention is not dependent on the status of the memories.

Because the Toyoshima publication does not disclose all elements recited in the claims (flash memory controller, wireless module, *and* control chip, as opposed to just a microprocessor and signal processor), and because the differences have to do with differences in the purpose and operation of the devices of Toyoshima and the claimed invention, it is respectfully submitted that the Toyoshima does not anticipate or suggest the claimed invention, and withdrawal of the rejection of claims 1-4 in view of the Toyoshima publication is respectfully requested.

Having thus overcome the sole rejection made in the Official Action, expedited passage of the application to issue is requested.

Respectfully submitted,
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